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January 19, 2021

**VIA ECF**

Honorable Barbara Moses  
United States District Court  
Southern District of New York  
New York, New York 10007

**Re: *Morgan Art Foundation Ltd. v. McKenzie, et al.*, 18-cv-04438 (AT); *Morgan Art Foundation Ltd., et al. v. Brannan*, 18-cv-08231 (AT)**

Dear Judge Moses,

I write on behalf of the Plaintiffs in advance of the parties' January 21, 2021 status conference. The Estate joins this letter.

The parties respectfully request that Your Honor mediate MAF and the Estate's disputes. The Star of Hope has also agreed to participate in the mediation. The parties are prepared to make their mediation submissions promptly and, subject to the Court's schedule, would hope to complete the mediation process within one month.

Respectfully submitted,

*/s/ Luke Nikas*

Luke Nikas

**quinn emanuel urquhart & sullivan, llp**

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